

Honorable Tiffany M. Cartwright

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT TACOMA**

DAYLYNNE SINGLETON, as Administrator  
of the ESTATE OF SHELLY ANN  
MONAHAN, and on behalf of all statutory  
beneficiaries thereof, including JM, SM, AM,  
RV, ROSIE MONAHAN, KEITH  
MONOHAN, and RAY EDWARD  
MARTINEZ,

Plaintiffs,

v.

CLARK COUNTY, a county of the State of  
Washington, NAPHCARE, INC., an Alabama  
Corporation, ALYSSA CLARKE, LEXIE  
HUNTER, ROSE MAINAH, SHANNON  
PARIS, JULI PFAU, KAYLEA TRIPP,  
AMANDA BIVER, ALEXANDRA SLISS,  
JAMES EASTMAN, CHANELLE  
HACKNEY, DANIEL GORECKI, AUSTIN  
E. CLOYD, IAN DAVID FRAZIER, RAY  
BETTGER, KEITH JONES, JUSTIN  
SHOEMAKER, CLARK COUNTY JOHN  
DOES ONE THROUGH TEN, in their  
individual and official capacity, and  
NAPHCARE JOHN DOES ONE THROUGH  
TEN, in their individual and official capacity,

Defendants.

NO. 3:24-cv-05392-TMC

**STIPULATION AND ORDER FOR  
WITHDRAWAL OF ATTORNEYS  
FOR DEFENDANTS CLARK  
COUNTY, AUSTIN CLOYD, DAVID  
FRAZIER, RAY BETTGER, KEITH  
JONES, AND JUSTIN SHOEMAKER**

**NOTE ON MOTION CALENDAR:  
September 26, 2024**

STIPULATION AND ORDER FOR  
WITHDRAWAL OF ATTORNEYS - 1  
NO. 3:24-cv-05392-TMC

SIMMONS SWEENEY FREIMUND SMITH TARDIF PLLC

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The Parties to the above-captioned matter hereby stipulate to the withdrawal of Allison Croft and Melissa Nelson of the law firm Simmons Sweeney Freimund Smith Tardif, PLLC as attorneys for Defendants Clark County, Austin Cloyd, David Frazier, Ray Bettger, Keith Jones, and Justin Shoemaker.

Ann Trivett and Audrey Airut-Murphy of Keating, Bucklin & McCormack, Inc., P.S. will continue to serve as the attorneys of record for Defendants Clark County, Austin Cloyd, David Frazier, Ray Bettger, Keith Jones, and Justin Shoemaker. (Dkt. 26).

This Stipulation is submitted with the knowledge and consent of Defendants Clark County, Austin Cloyd, David Frazier, Ray Bettger, Keith Jones, and Justin Shoemaker. As shown by the attached Proof of Service, notice of this Stipulation has been served on all parties, including the representatives for Defendants Clark County, Austin Cloyd, David Frazier, Ray Bettger, Keith Jones, and Justin Shoemaker, in accordance with Local Rule 83.2(b).

A proposed Order follows the parties' signatures.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated this 26th day of September 2024.

SIMMONS SWEENEY FREIMUND  
SMITH TARDIF, PLLC

KEATING, BUCKLIN & McCORMACK,  
INC., P.S.

s/ Allison Croft  
ALLISON CROFT, WSBA NO. 30486

s/ Ann E. Trivett (email auth. 9/24/24)  
ANN E. TRIVETT, WSBA NO. 39228

s/ Melissa Nelson  
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*Withdrawing Special Deputy Prosecuting  
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Austin Cloyd, David Frazier, Ray Bettger,  
Keith Jones, and Justin Shoemaker*

*Attorney for Defendants Clark County, Austin  
Cloyd, David Frazier, Ray Bettger, Keith  
Jones, and Justin Shoemaker*

SIMMONS SWEENEY FREIMUND SMITH TARDIF PLLC

STIPULATION AND ORDER FOR  
WITHDRAWAL OF ATTORNEYS - 2  
NO. 3:24-cv-05392-TMC

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*Attorney for Plaintiffs*

## ORDER (PROPOSED)

Based on the foregoing stipulation, the Court hereby ORDERS that the withdrawal of Allison Croft and Melissa Nelson of the law firm Simmons Sweeney Freimund Smith Tardif, PLLC as attorneys for Defendants Clark County, Austin Cloyd, David Frazier, Ray Bettger, Keith Jones, and Justin Shoemaker is hereby GRANTED. Ann Trivett and Audrey Airut-Murphy of Keating, Bucklin & McCormack, Inc., P.S. will continue to serve as the attorneys of record for Defendants

SIMMONS SWEENEY FREIMUND SMITH TARDIF PLLC

STIPULATION AND ORDER FOR  
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1 Clark County, Austin Cloyd, David Frazier, Ray Bettger, Keith Jones, and Justin Shoemaker.  
2 (Dkt. 26).

3 DATED this 26th day of September 2024.

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6  
7 Tiffany M. Cartwright  
8 United States District Judge  
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**PROOF OF SERVICE**

I hereby certify that on September 26th, 2024, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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I further certify that a copy of this filing was emailed to Amanda Migchelbrink and Leslie Lopez, Representatives for Defendants Clark County, Austin Cloyd, David Frazier, Ray Bettger, Keith Jones, and Justin Shoemaker at [Amanda.Migchelbrink@clark.wa.gov](mailto:Amanda.Migchelbrink@clark.wa.gov) and [Leslie.Lopez@clark.wa.gov](mailto:Leslie.Lopez@clark.wa.gov).

I further certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 26th day of September 2024, at Chehalis, Washington.

s/ Casey Miller

CASEY MILLER, Paralegal